

1 **PATRICK BUELNA, ESQ., SBN 317043**

2 POINTER & BUELNA, LLP

3 LAWYERS FOR THE PEOPLE

4 Wells Fargo Center

5 1901 Harrison St., Suite 1140,

6 Oakland, CA 94612

7 Tel: 510-929-5400

8 Email: PBuelna@LawyersFTP.com

9

10 Attorneys for Plaintiffs

11

12 UNITED STATES DISTRICT COURT

13 EASTERN DISTRICT OF CALIFORNIA

14

15 DONNIE WOODRAL,

16 Plaintiff,

17 v.

18 COUNTY OF STANISLAUS, et al.,

19 Defendants.

20

21 Case No: 1:20-cv-00372-NONE-BAM

22

23 **STIPULATION & ORDER**

24 **FOR LEAVE TO EXTEND DEADLINE**

25 **FOR EXPERT DISCOVERY**

26

27 WHEREAS, the Current Case Schedule has the Close of Expert Discovery set for June 7, 2021.

28

29 WHEREAS, the parties had scheduled the two expert deposition to take place the first week of

30 June, 2021.

31

32 WHEREAS, Plaintiff's counsel unexpectedly had a trial rescheduled and take place from May

33 17-May 28.

34

35 WHEREAS, Plaintiff's counsels schedule has been severely impacted by the trial taking place

36 and caused him unable to accomplish and conduct the expert depositions the first week of June.

37

38 WHEREAS, the parties met and conferred and agreed to reschedule the depositions for later

39 in June and extend the date of the close of expert discovery to June 30, 2021.

1 WHEREAS, the extension of the close of expert discovery will not impact any other date in the
2 Court's Case Schedule.

3 WHEREAS, for all the aforementioned reasons the parties agree to stipulate and there exists
4 GOOD CAUSE to extend the Close of Expert Discovery to June 30, 2021.

5 Date: May 27, 2021

6 **POINTER & BUELNA, LLP**
7 **LAWYERS FOR THE PEOPLE**

8
9 /s/ Patrick Buelna
10 PATRICK M. BUELNA
COUNSEL FOR PLAINTIFFS

11 Date: May 27, 2021

12 **RIVERA HEWITT PAUL LLP**

13 /s/ Shanan Hewitt (as authorized on 05/17/21)
14 SHANAN HEWITT
COUNSEL FOR DEFENDANT
COUNTY OF STANISLAUS

16 **ORDER**

17 Pursuant to the parties' stipulation, and good cause appearing, the Scheduling Conference
18 Order is HEREBY MODIFIED and the deadline for completion of expert discovery is EXTENDED
19 to June 30, 2021.

20 IT IS SO ORDERED.

21 Dated: May 28, 2021

22 /s/ Barbara A. McAuliffe

23 UNITED STATES MAGISTRATE JUDGE